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Before the  
**FEDERAL COMMUNICATIONS COMMISSION**  
Washington, D.C. 20554

In the Matter of )

)  
Amendment of Section 73.202(b) )  
Table of Allotments, )  
FM Broadcast Stations. )  
(Cape Girardeau and )  
Chaffee, Missouri, and )  
Union City, Tennessee) )

113  
MM Docket No. 94-198

RM-8514

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TO: Chief, Mass Media Bureau

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

**SUPPLEMENT TO COUNTERPROPOSAL**

Twin States Broadcasting, Inc. ("Twin States"), by its attorneys, hereby submits its Supplement to Counterproposal in the above-captioned proceeding, stating as follows:

As noted in the Twin States Counterproposal, filed on November 25, 1994, facsimile copies of the Engineering Statement and the proponent's own certified Statement were appended thereto as Attachments B and C. Originals of those documents have now been received and are being submitted herewith.

It should be noted in this regard that the station contours shown in Exhibit 2 to Attachment B (and repeated in Exhibits 3, 4, 5, 6, 7, 8 and 9), which depict existing services in WKWT(FM)'s proposed gain area, have now been identified by call sign. Similarly, the station contours shown in Exhibit 5A to Attachment B (and repeated in Exhibits 6A, 7A, 8A and 9A), which depict existing services in Greaser's proposed service area, also have now

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been identified by call sign. The substance of Exhibits 2 and 5A to Attachment B has not been changed, while the additional identifying information will assist the Commission staff and Greaser in evaluating such data. Acceptance of the instant Supplement to Counterproposal therefore is respectfully requested.

Respectfully submitted,

TWIN STATES BROADCASTING, INC.

By:



Eric S. Kravetz  
Brown, Nietert & Kaufman  
1920 N Street, N.W.  
Suite 660  
Washington, D.C. 20036  
(202) 887-0600

Its Attorneys

Dated: December 2, 1994

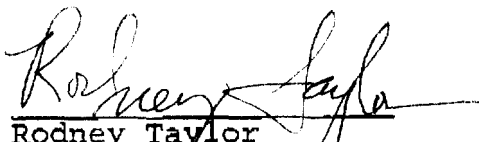
STATEMENT

Rodney Taylor states as follows:

I am President of Twin States Broadcasting, Inc., which has requested the Federal Communications Commission to amend its Rules and upgrade the channel of Station WKWT(FM), Union City, Tennessee, from 285A to 284C2. The attached Counterproposal, which restates that request, was prepared at my direction and is true and correct to the best of my knowledge and belief. If the channel of WKWT(FM) is upgraded by the Commission, Twin States Broadcasting, Inc. will immediately file an application for a permit to operate on the upgraded channel and, upon grant of that application, will immediately construct and operate that modified station. Twin States Broadcasting, Inc. also will reimburse Station KYRX(FM), Chaffee, Missouri, for the reasonable and prudent expenses which it incurs for the change in its operating frequency which would result from the WKWT(FM) upgrade.

I hereby certify under penalty of perjury that the above statement is true and correct. Dated this 23rd day of November, 1994.

By:

  
Rodney Taylor  
President, Twin States  
Broadcasting, Inc.

**TWIN STATES BROADCASTING  
COMMENTS/COUNTERPROPOSAL  
TO DOCKET NO. 94-113 RM 8514  
CAPE GIRARDEAU, MO AND  
UNION CITY, TN  
NOVEMBER 1994**

These comments are filed on behalf of Twin States Broadcasting ("Twin States") licensee of WKWT (FM), Union City, TN. Twin States has previously filed a request for rule making to substitute Channel 284 C2 for the presently allotted 285 A at Union City. In order for this to meet §73.207 spacing, KYRX, Chaffee, MO is required to move to Channel 230 A from its present Channel 284A. No site change is required of KYRX. Simultaneous to the Twin States petition, Kevin G. Greaser ("Greaser") requested the use of Channel 230 A at Cape Girardeau, MO as that city's third FM allotment. Because §73.207 requires co-channel Class A stations to be a minimum of 115 KM apart and because there is only a distance of 18.2 KM between KYRX and the Greaser proposal, the Twin States petition and the Greaser petition are mutually exclusive.

Union City, TN presently has authorized two FM and one AM stations:

WKWT	285A	3 KW	91 M HAAT
WWUC	289A	6 KW	100 M HAAT
WENK	1240	1 KW	Unlimited

Cape Girardeau, MO presently has authorized three FM and three AM stations:

KRCU	215A	6 KW	79 M HAAT
KGMO	264C	100 KW	301 M HAAT
KEZS	275C1	100 KW	289 M HAAT
KZIM	960	5 KW/ 5 KW	Full Time
KCGQ	1220	.25 KW	Day (secondary low power night authority)
KAPE	1550	5 KW	Day (secondary low power night authority)

An extensive study was made of the Twin States gain area<sup>1</sup> and compared to the Greaser proposed area. All nearby stations were examined to ascertain which stations touched either area with its 60 dBu signal<sup>2</sup>. Class C3, C2 and C1 stations were calculated at class maximum unless they had invoked §73.215 processing. Class A and Class C and educational stations were plotted at their licensed facilities. Because only full time AM stations were considered in this study, only night time AM signals were plotted. Plotting all contributing stations subdivides the gain areas into pockets. The area and population of each pocket was then estimated. Population was based on the 1990 Census and an even distribution of population was assumed. The following chart summarizes the population, area and number of services in each pocket:

Twin States			Greaser	
Service	Area	Population	Area	Population
3rd	30 Sq KM	543	0 Sq KM	0
4th	483	8681	0	0
5th	664	11936	0	0
6th	1087	19531	25	816
7th	1087	19531	224	7343
8th	966	17361	298	9790
9th	664	11936	597	19581
10th	423	7596	671	22028

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<sup>1</sup> Gain area was derived by subtracting the present WKWT Class A area from the proposed Class C2 area. Population gain was similarly calculated.

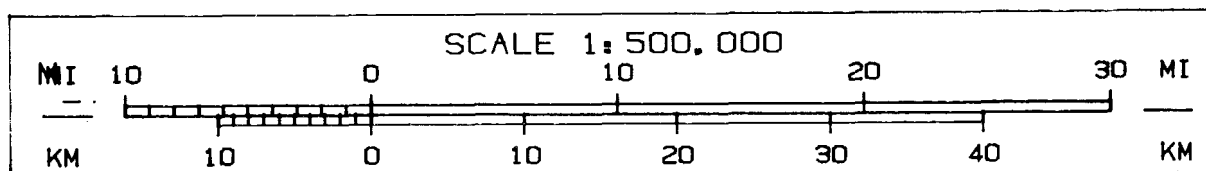
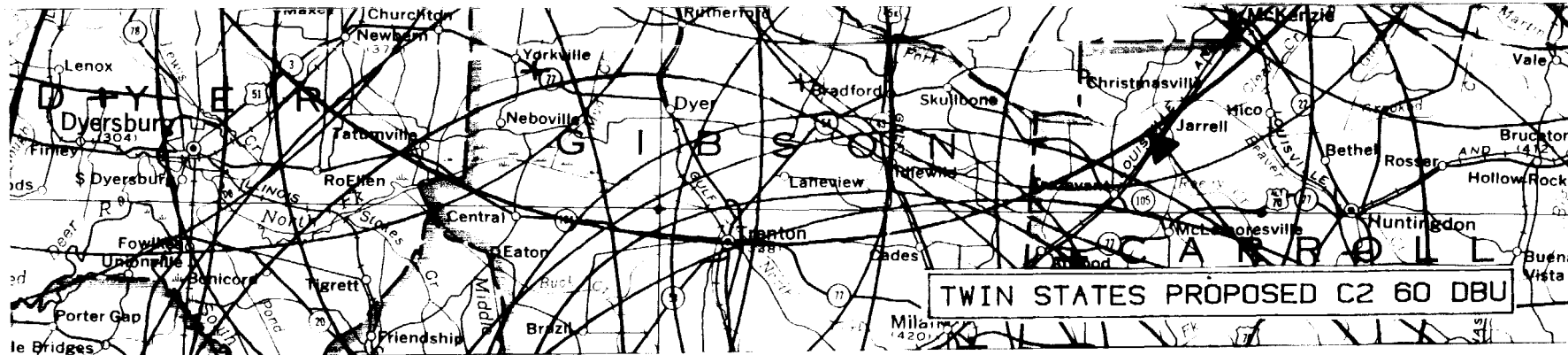
<sup>2</sup> A complete list of all stations whose 60 dBu touches either gain area is found as Exhibit # 10 and 10A.

There are pockets that Twin States provides the third, fourth and fifth full time service while the highest priority service Greaser can provide is sixth. The Twin States counterproposal offers more total persons than Greaser. 108,508 persons reside in the Twin States gain area while only 81,586 persons reside in the Greaser proposed area. Likewise, Twin States proposes to serve a larger gain area. The Twin States gain area is 6,036.8 square kilometers while the Greaser area is only 2,486.8 square kilometers.

In summary, Twin States provides third, fourth or fifth full time service to 21,160 persons while Greaser provides none. Overall Twin States serves 26,922 more persons than the Greaser proposal. Finally, Twin States serves 3,550 square kilometers more than the Greaser proposal. It is believed that the foregoing reasons are firm substantiation that the public would be far better served by the allotment of the Twin States proposal, the ordering of WKWT to Channel 284 C2 and the substitution of Channel 230 A at Chaffee, MO for Channel 284 A.

  
\_\_\_\_\_  
Clifton G. Moor  
Bromo Communications, Inc.

November 25, 1994  
Date



## TWIN STATES PROPOSED GAIN AREA

MAP IS COMPOSITE USGS 1:500,000 SCALE  
FOR STATES OF TENNESSEE, KENTUCKY AND  
MISSOURI

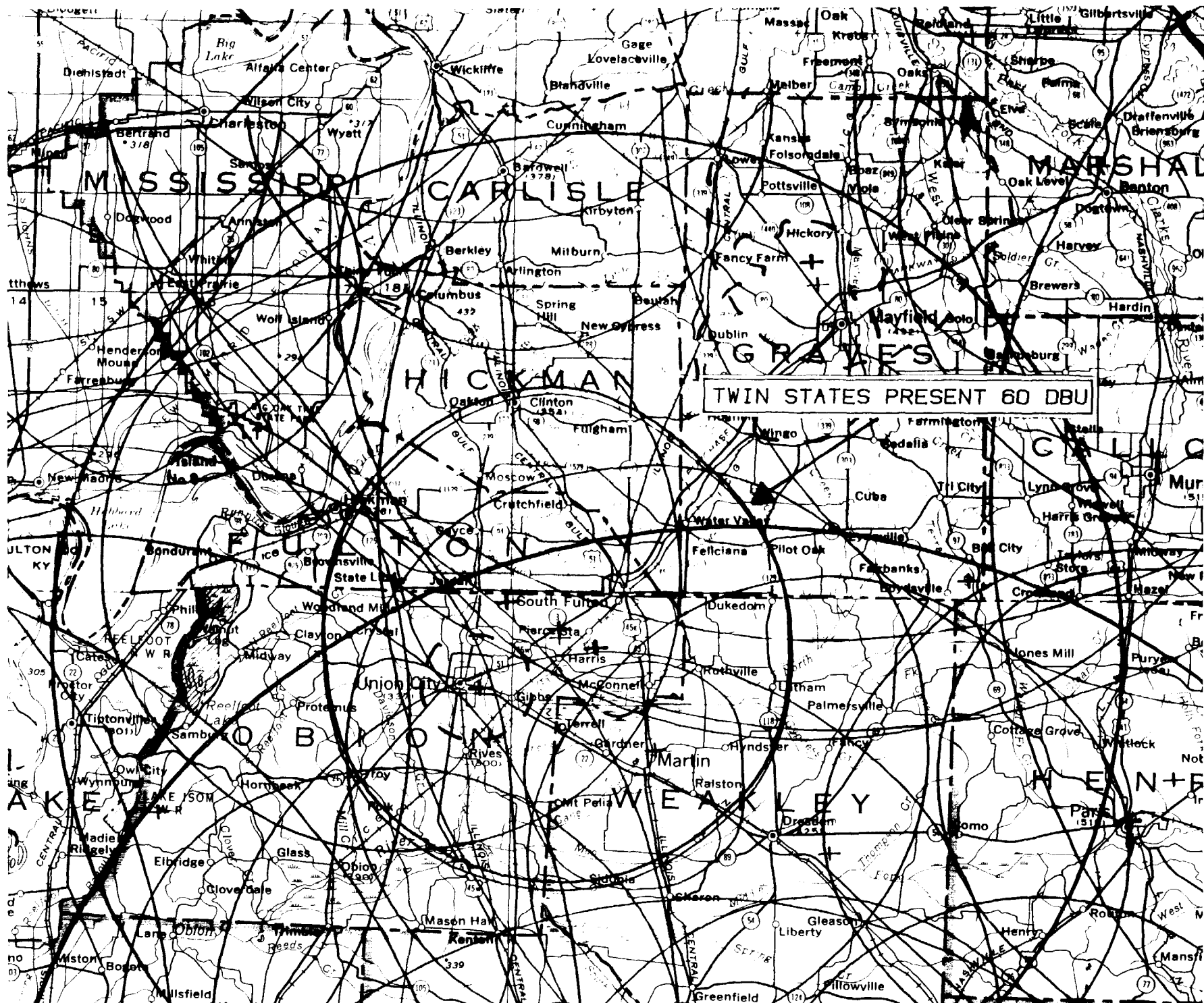
## EXHIBIT #1

TWIN STATES BROADCASTING  
COMMENTS/COUNTERPROPOSAL  
TO DOC NO. 94-113 RM-8514  
CAPE GIRARDEAU, MO AND  
UNION CITY, TN  
NOVEMBER 1994

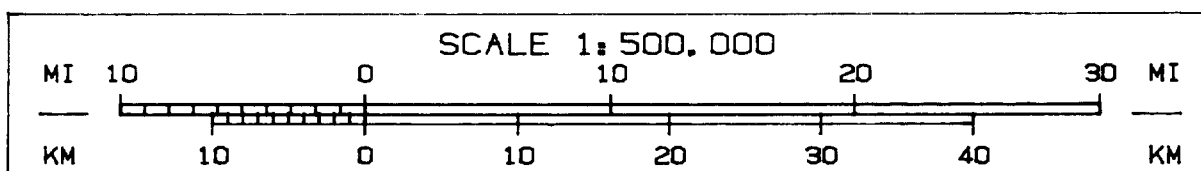
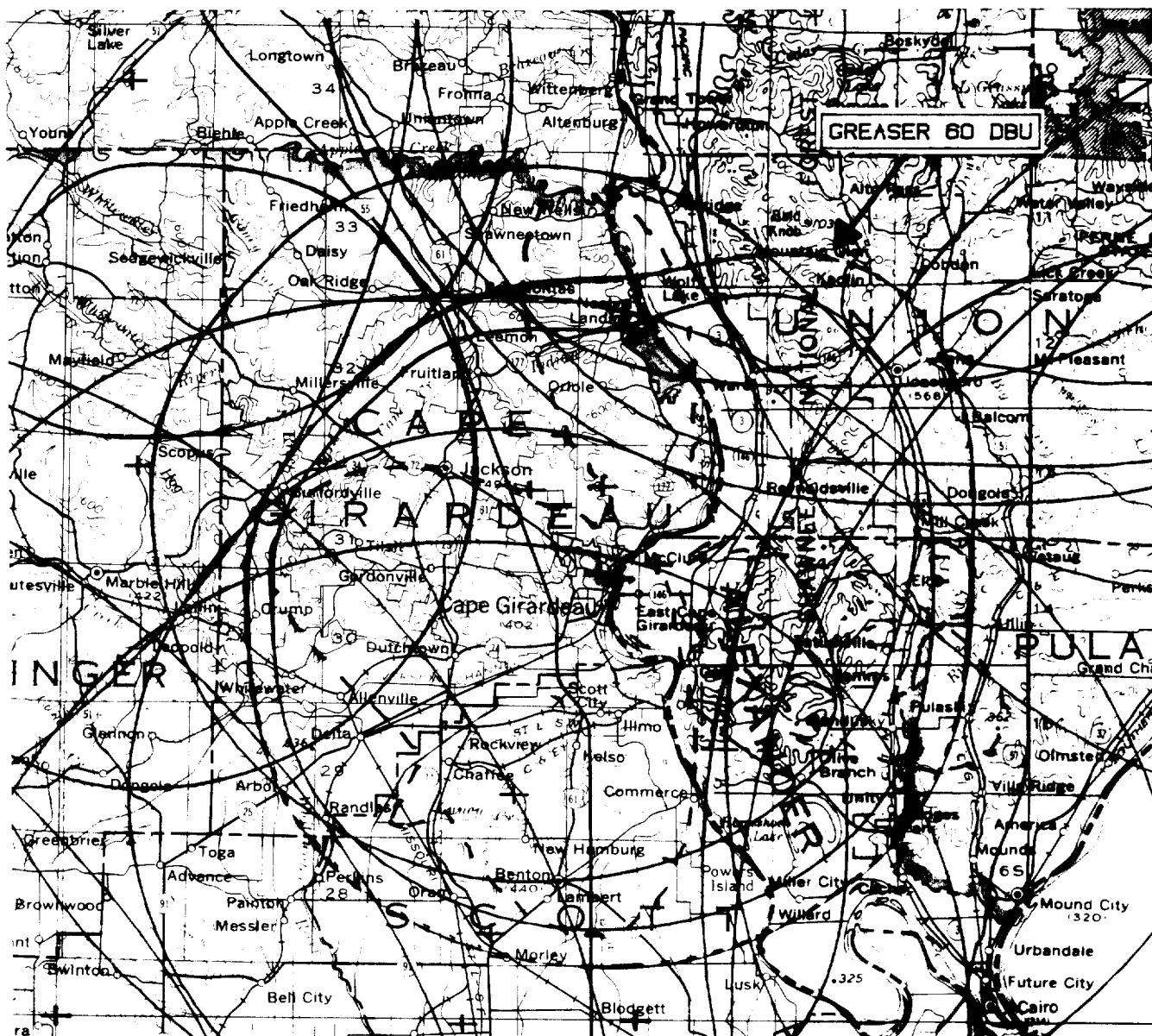
**BROMO** BROADCAST  
COMMUNICATIONS TECHNICAL CONSULTANTS

St Simons Island, Georgia

Washington, D.C.







#### GREASER PROPOSED AREA

MAP IS COMPOSITE USGS 1:500,000 SCALE FOR STATES OF MISSOURI AND ILLINOIS.

#### EXHIBIT #1A

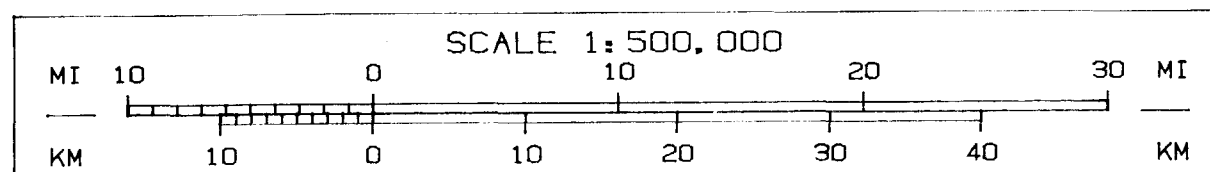
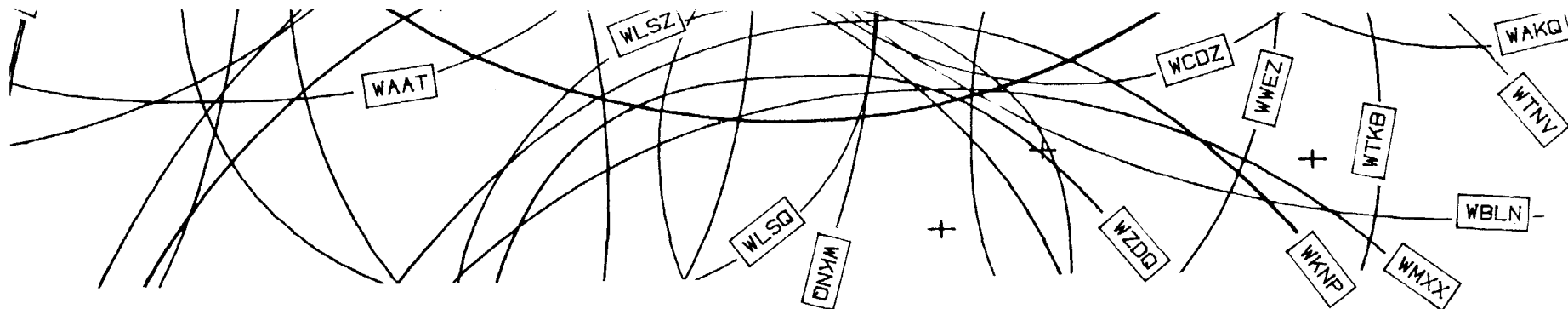
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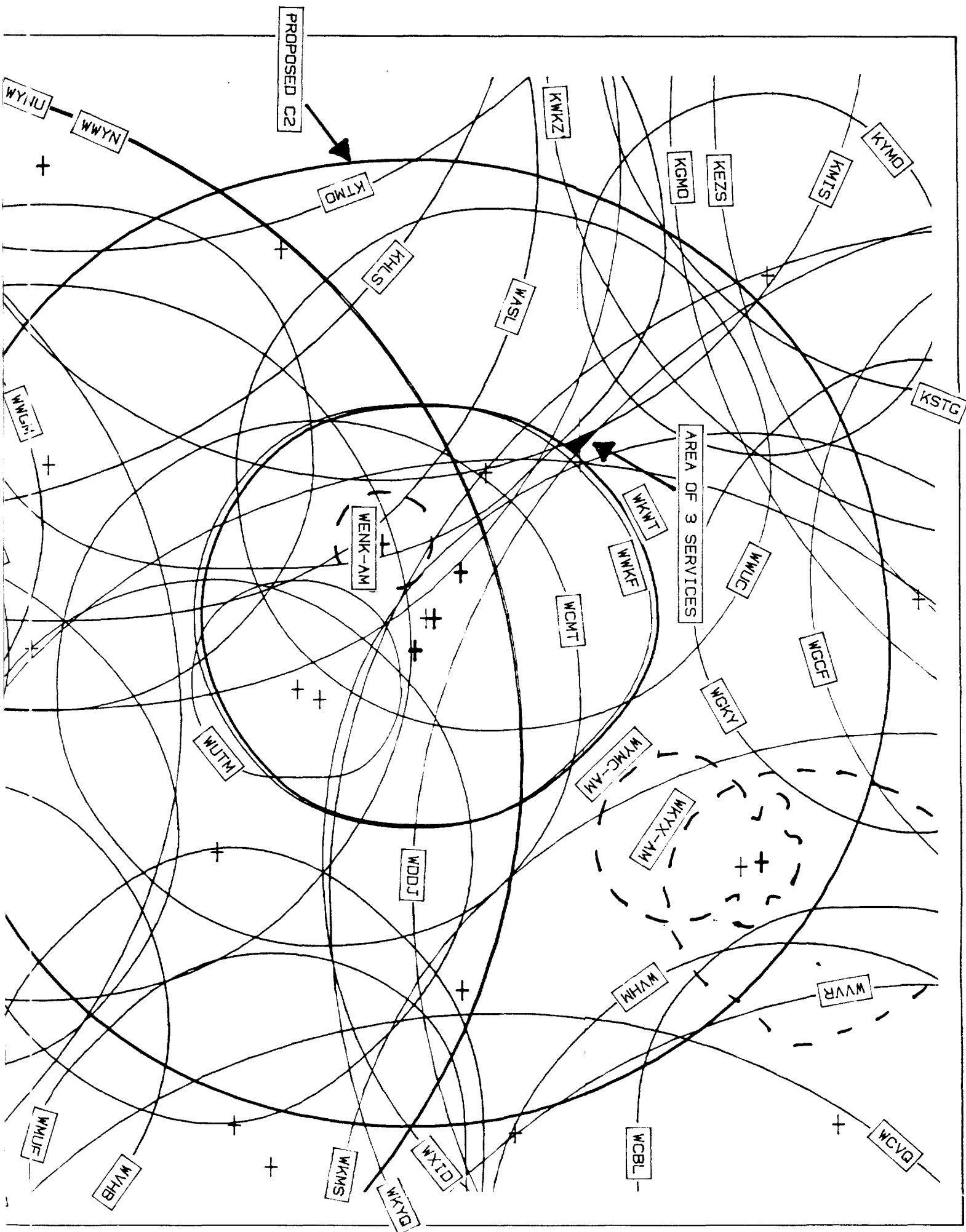


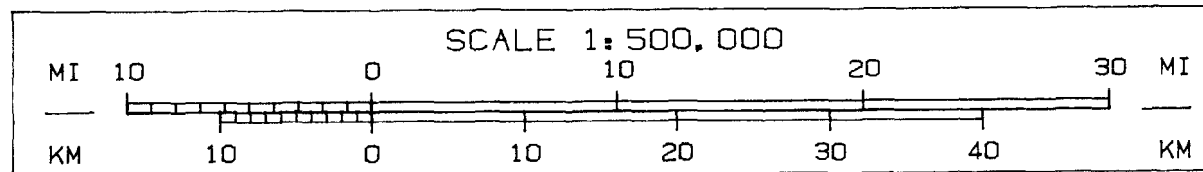
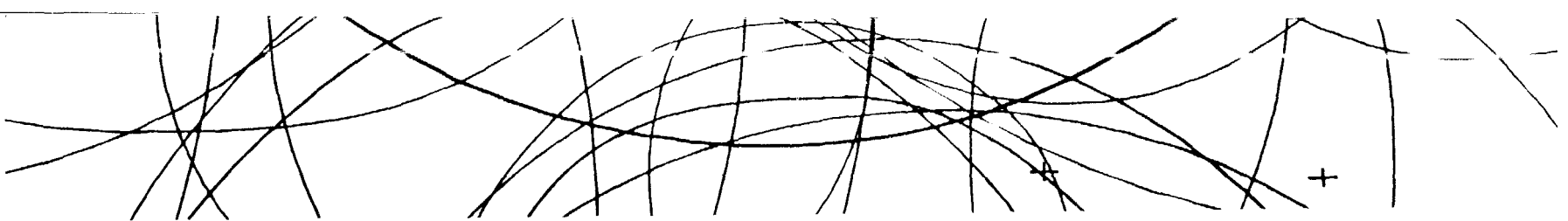
TWIN STATES 3RD SERVICE AREA

EXHIBIT #2

TWIN STATES BROADCASTING  
 COMMENTS/COUNTERPROPOSAL  
 TO DOC NO. 94-113 RM-8514  
 CAPE GIRARDEAU, MO AND  
 UNION CITY, TN  
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TWIN STATES 4TH SERVICE AREA

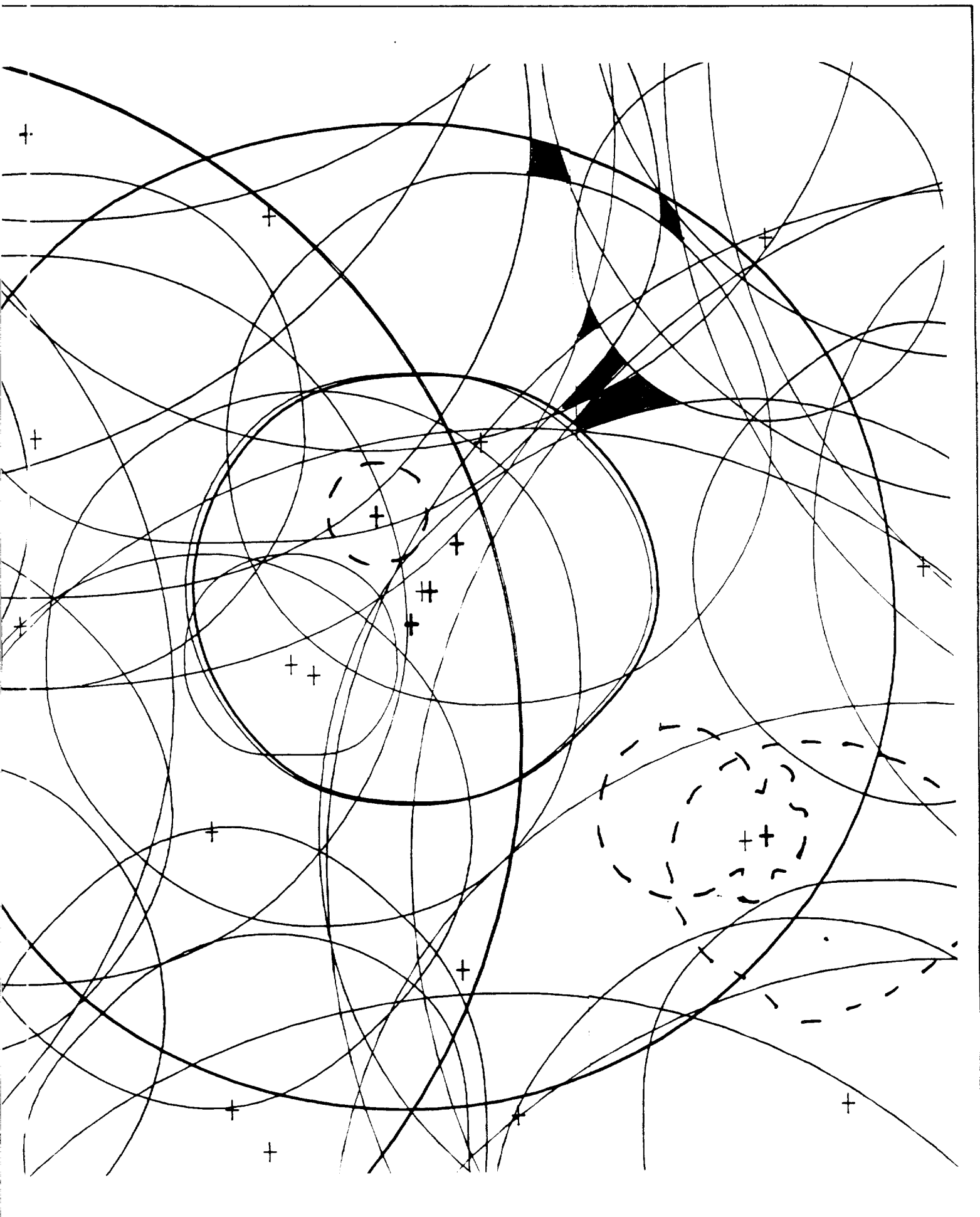
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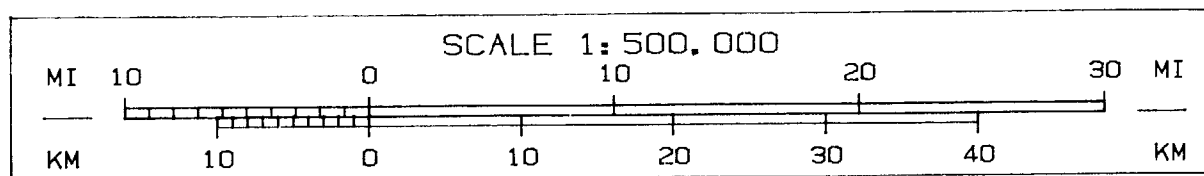
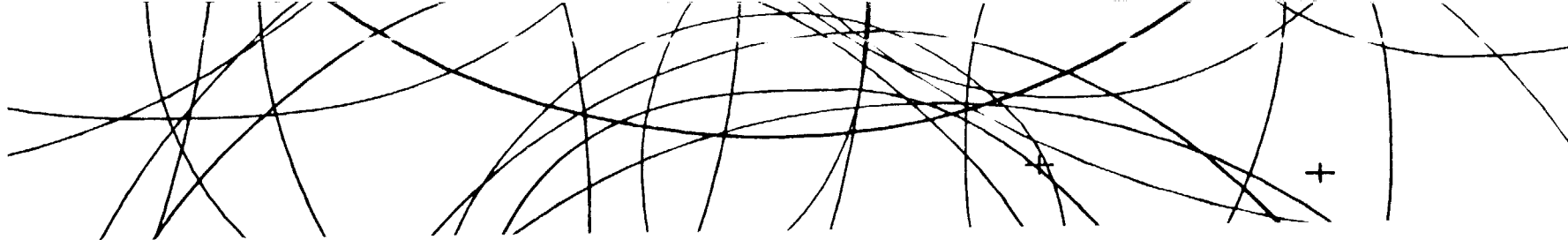
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TWIN STATES 5TH SERVICE AREA

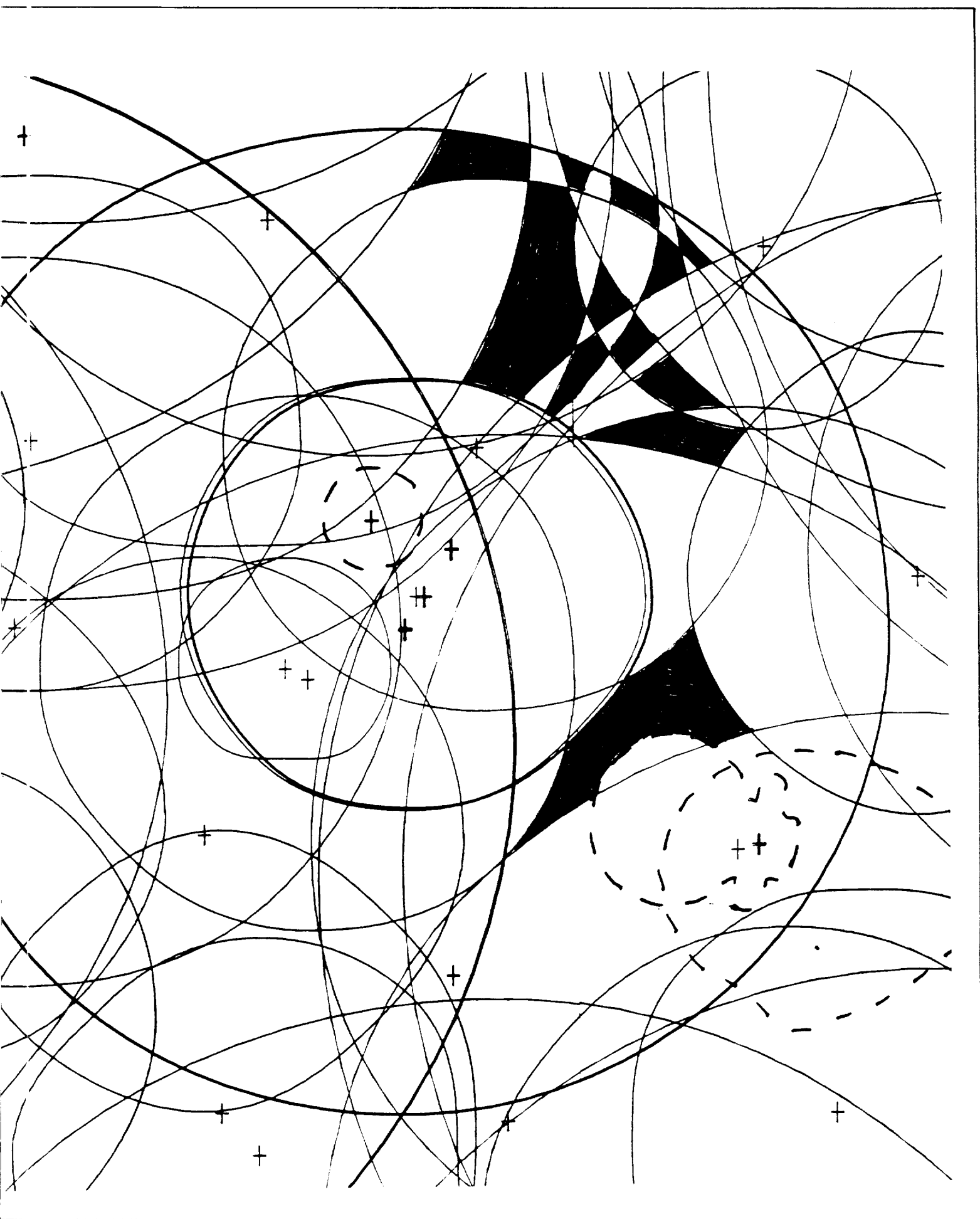
EXHIBIT #4

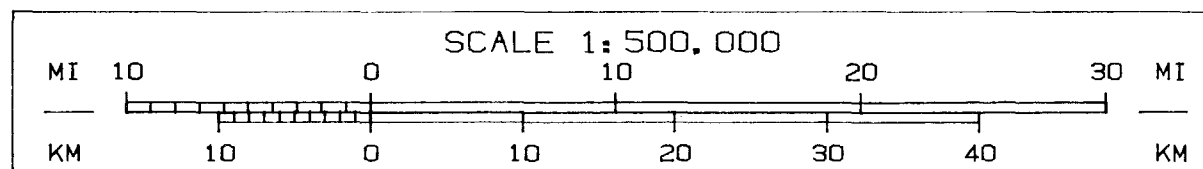
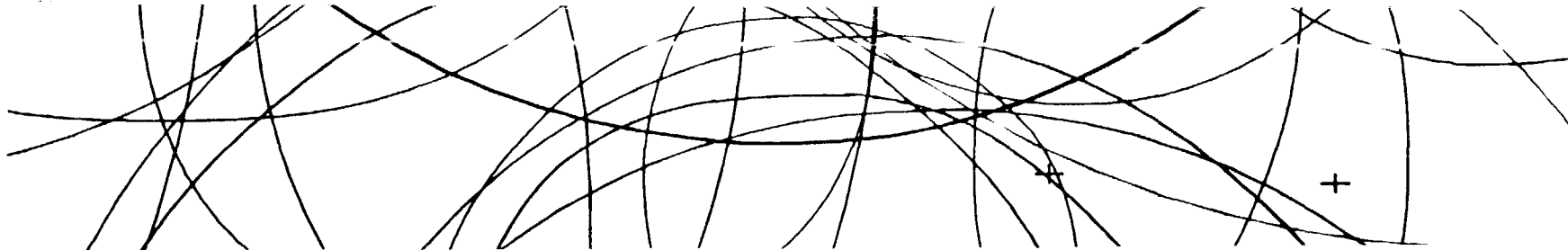
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NOVEMBER 1994

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TWIN STATES 6TH SERVICE AREA

EXHIBIT #5

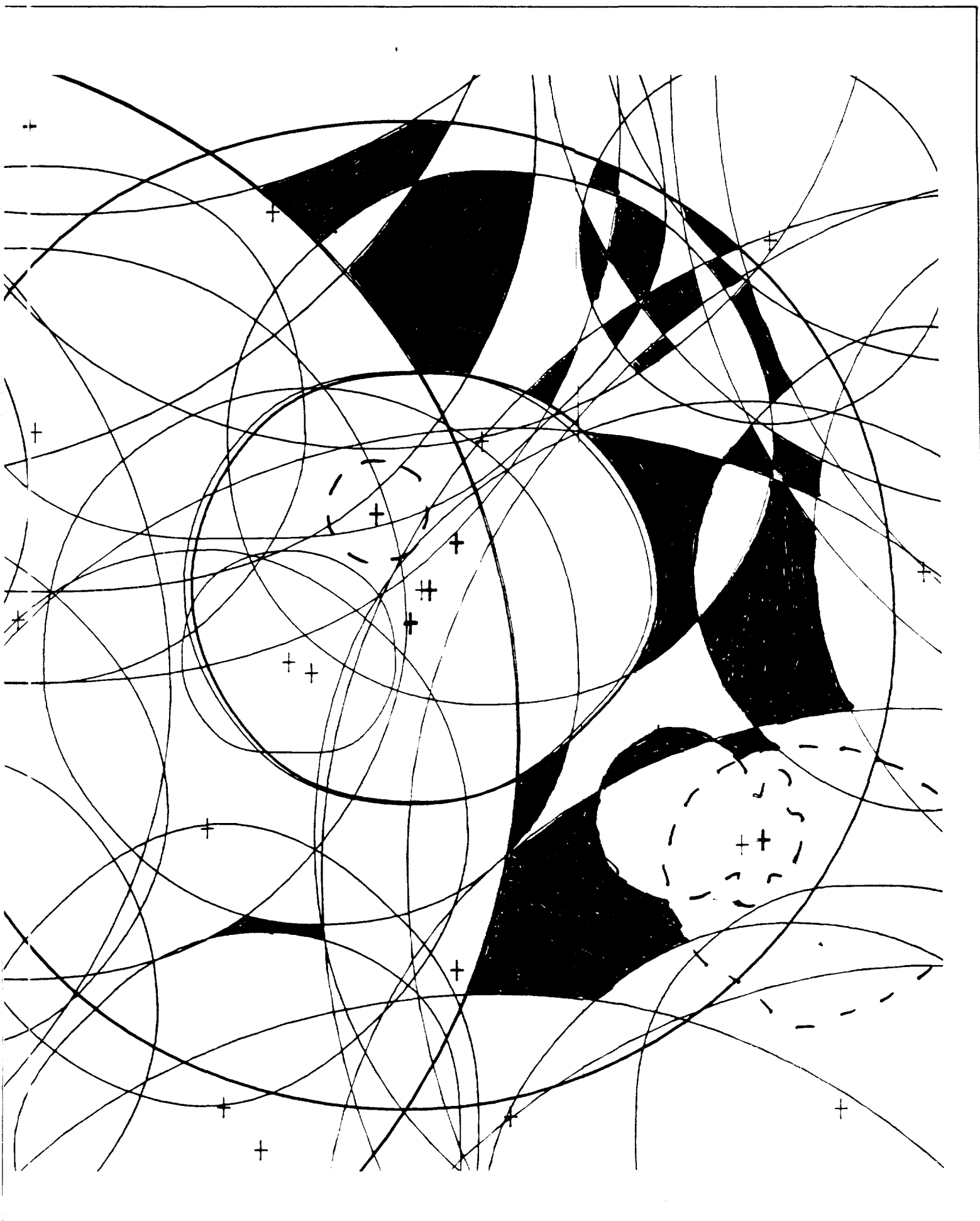
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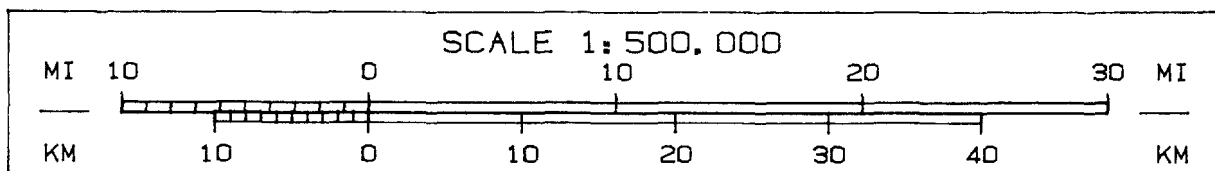
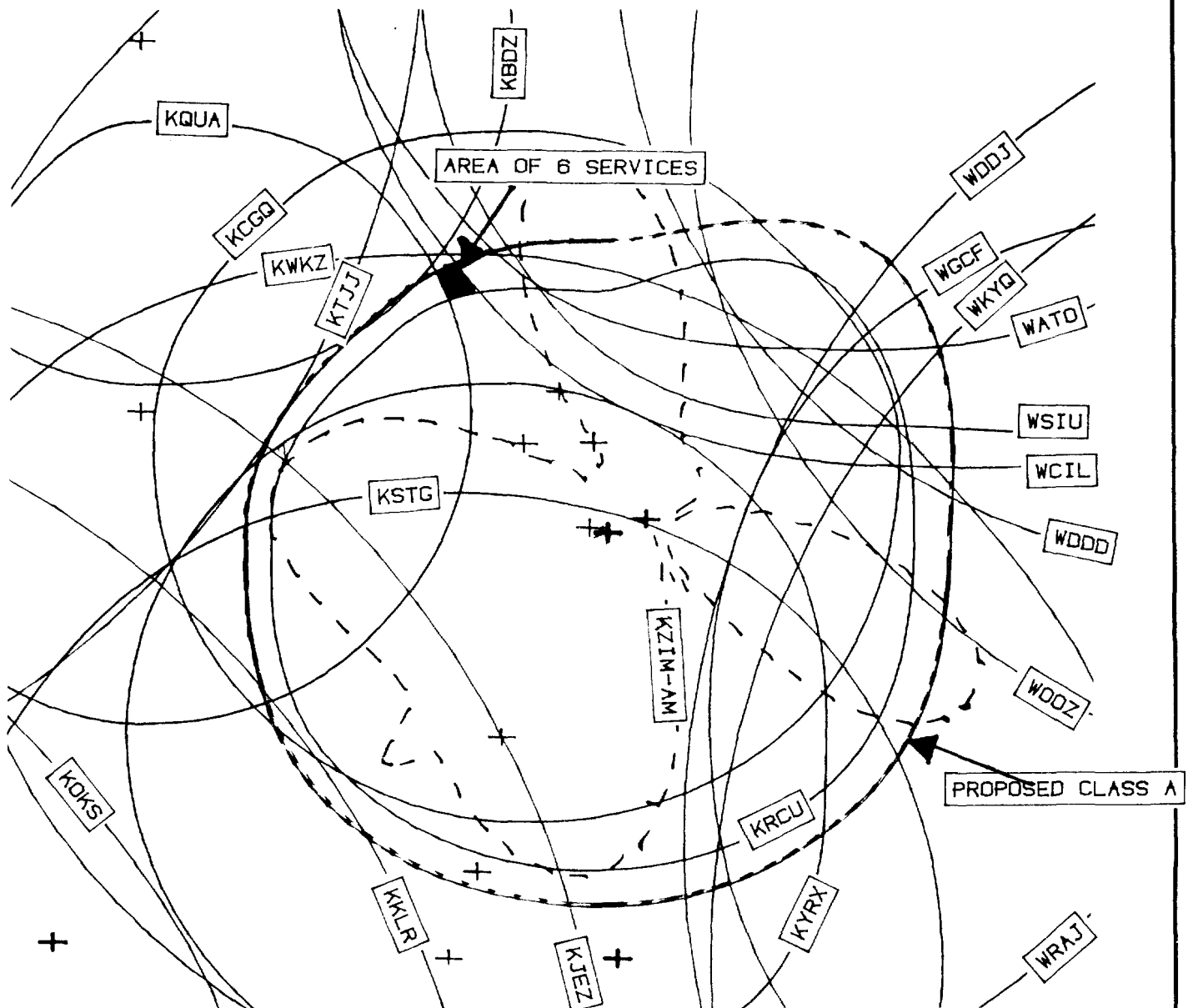
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KGMO  
KEZS

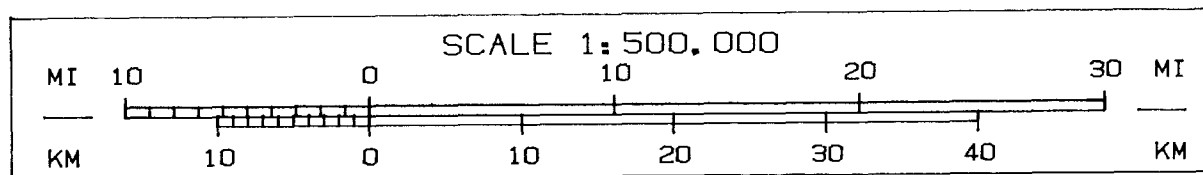
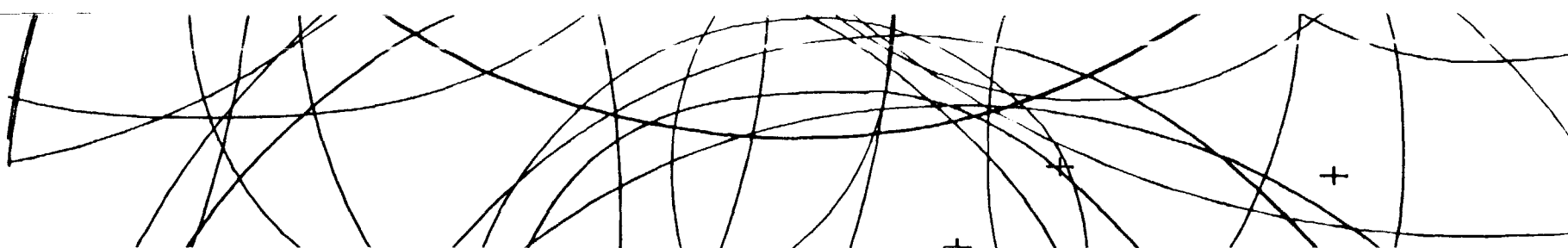
#### GREASER 6TH SERVICE AREA

THE CONTOURS OF KGMO AND KEZS COVER THE ENTIRE GREASER SERVICE AREA.

#### EXHIBIT #5A

TWIN STATES BROADCASTING  
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TO DDC NO. 94-113 RM-8514  
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TWIN STATES 7TH SERVICE AREA

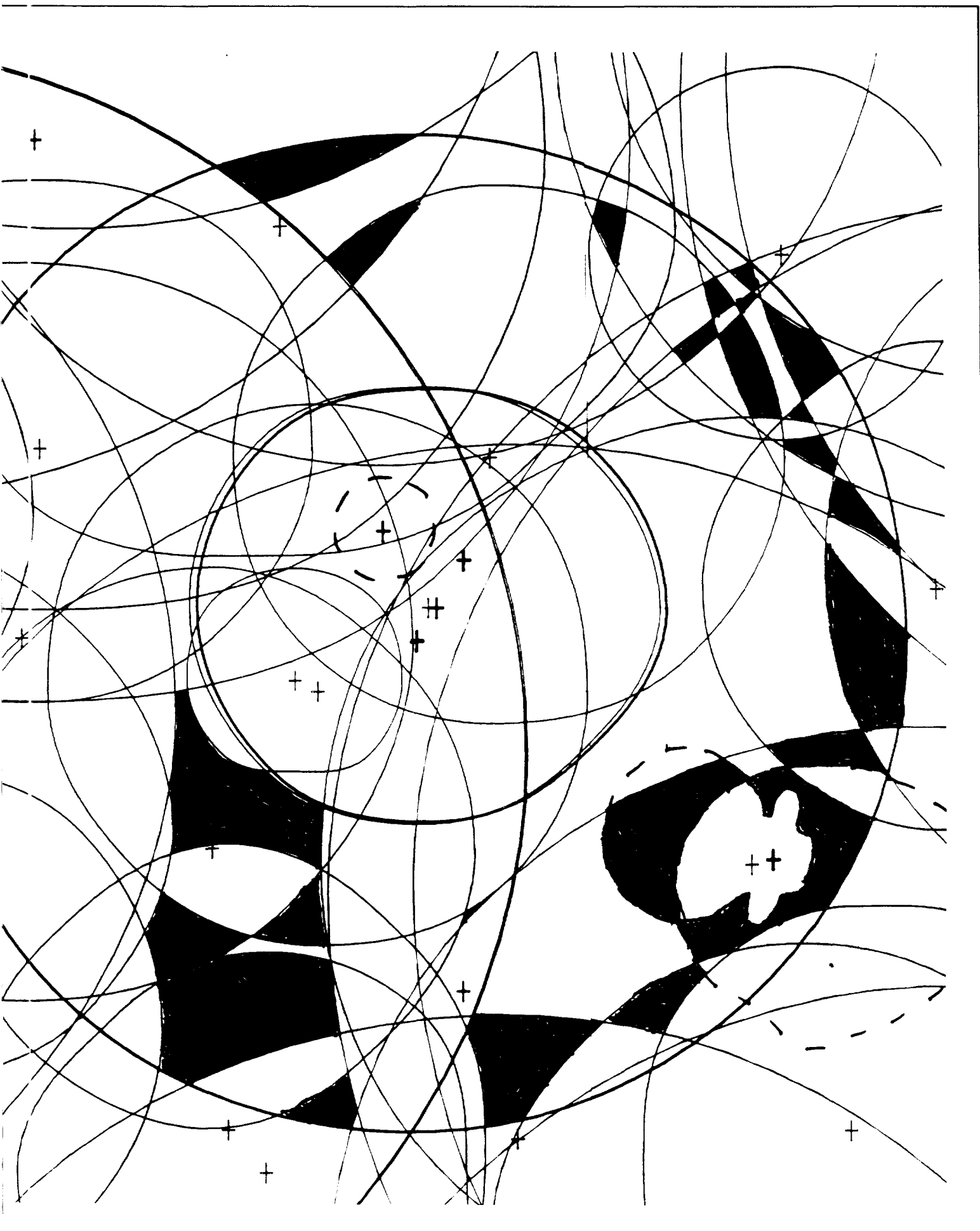
EXHIBIT #6

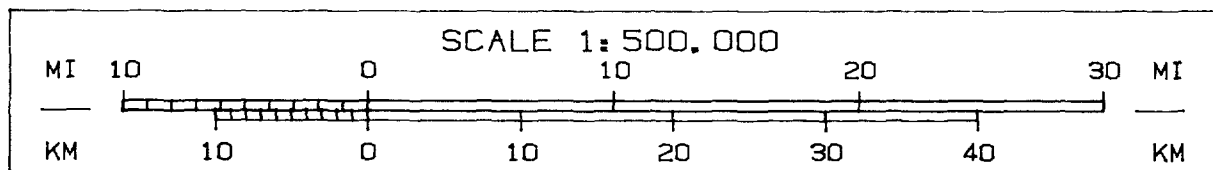
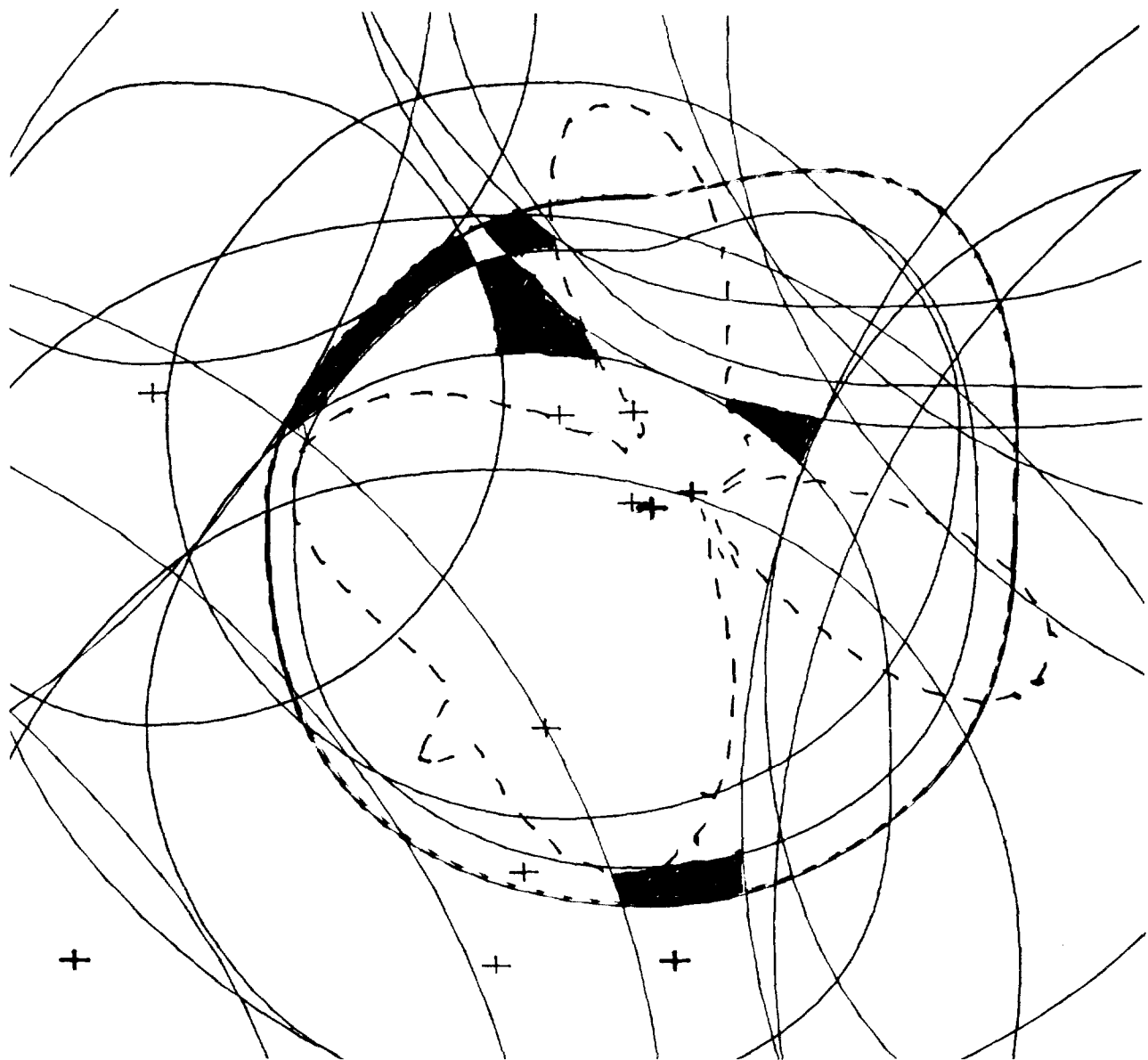
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GREASER 7TH SERVICE AREA

EXHIBIT #6A

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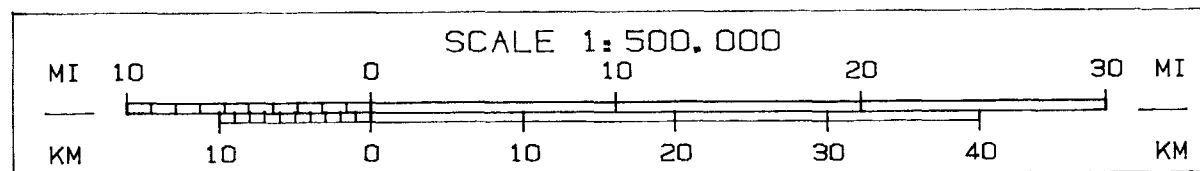
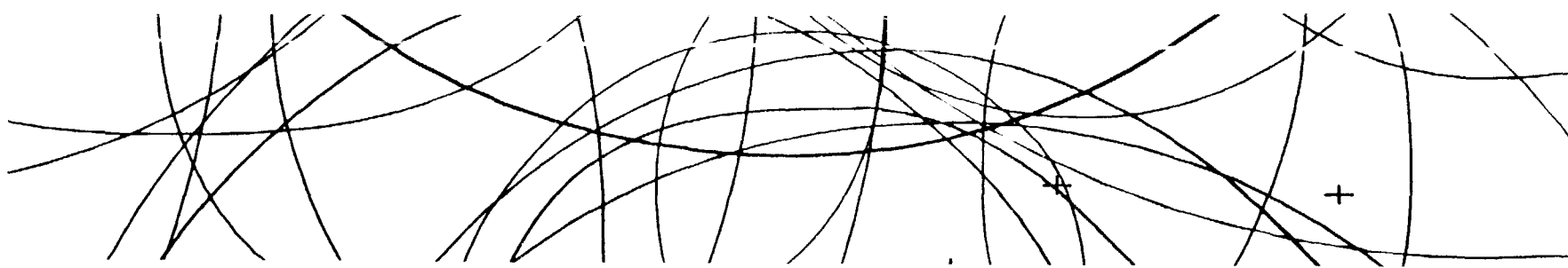
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TWIN STATES 8TH SERVICE AREA

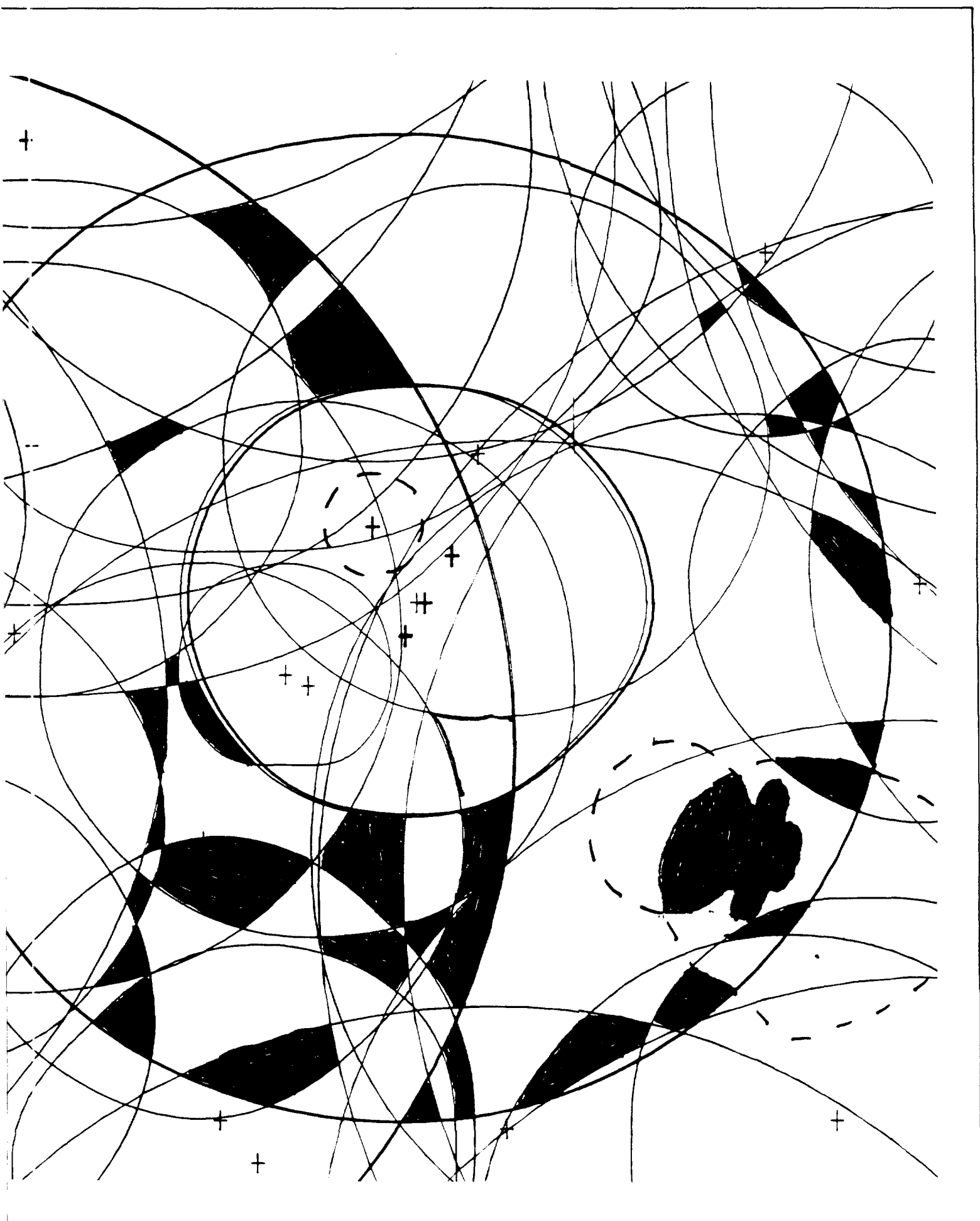
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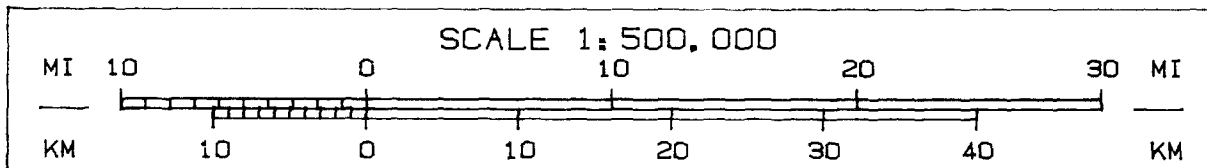
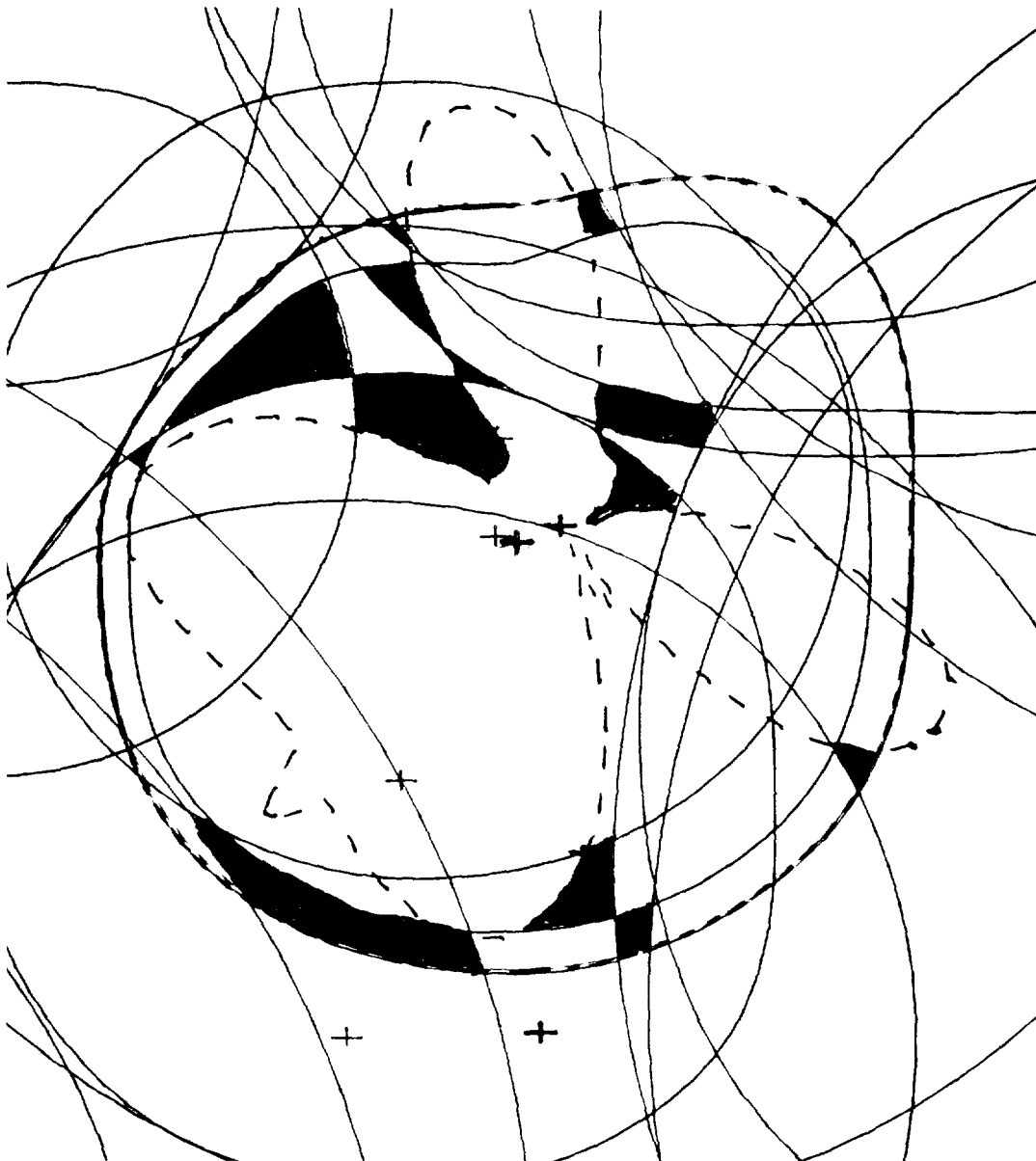
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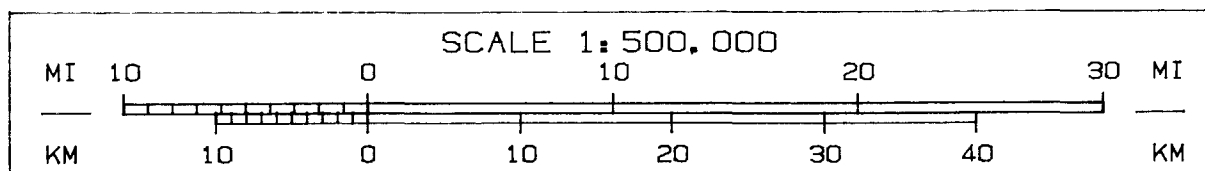
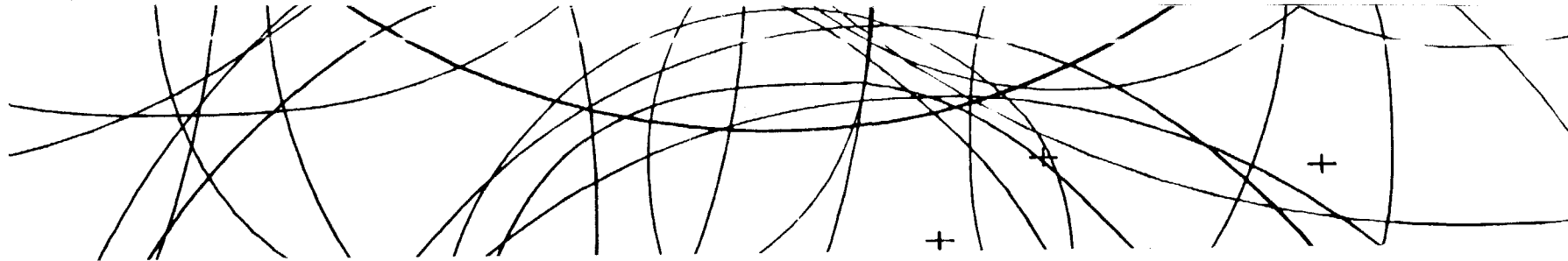
GREASER 8TH SERVICE AREA

EXHIBIT #7A

TWIN STATES BROADCASTING  
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NOVEMBER 1994

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Washington, D.C.





TWIN STATES 9TH SERVICE AREA

EXHIBIT #8

TWIN STATES BROADCASTING  
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